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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 12-00486-WHA
	)	
Plaintiff,	)	
	)	
v.	)	STIPULATION TO DISCLOSE GRAND
	)	JURY INFORMATION AND <del>PROPOSED</del>
JOHN KIERAN HYNES,	)	ORDER
	)	
Defendant.	)	

For the reason that the trial of this matter is set for March 25, 2013, and because the United States and the defendant are preparing this matter for trial and because they are also attempting to resolve this matter,

It is hereby stipulated by and between Plaintiff United States of America and Defendant John Kieran Hynes, through their respective counsel, as follows:

1. Pursuant to 18 U.S.C. § 3500 the United States may, at this time, disclose any Rule 6(e) grand jury testimony of its anticipated trial witnesses to defendant's counsel for use in the preparation and trial of this matter, and at the conclusion of the trial of this matter or upon entry of a guilty plea in this matter, defendant's counsel shall destroy such information; and

2. In the event the defendant enters a guilty plea in this matter, the United States Attorney may disclose any grand jury information in this matter to the Internal Revenue Service

1 for its use in the determination and litigation of any civil tax obligations arising from the  
2 investigation and prosecution of this matter.


3 MELINDA HAAG  
4 United States Attorney

5  
6 /s/  
7 JOHN YOUNGQUIST  
8 Attorney for the Defendant

6 /s/  
7 THOMAS MOORE  
8 Assistant United States Attorney

9  
10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11  
12  
13 Dated: March 11, 2013.

12   
13 UNITED STATES DISTRICT JUDGE  
14 William Alsup